

WATER QUALITY

The technical content of the technical report is more than necessary to support the PEIR/EIS. Much editing will need to be done to summarize the information without reducing the content to a superficial level of detail. The water quality impacts analysis supports a larger section due to its complexity and importance as an issue area. The level of detail in the affected environment summary is good for the PEIR/EIS. The regulatory history section needs culling for EIR/EIS. The report needs additional information on loadings, effects of parameters of concern, distinctions between standards, criteria, objectives, and suggested water quality values, and pollutant concentration ranges by region. The impacts section is not complete, as acknowledged in the report. Discussions of common programs appears to be more extensive than for the alternatives. Significance criteria need to be clarified to include standard CEQA criteria for water quality (per Appendix G and Initial Study checklist). Mitigation measures should be made more specific and discussions should clearly spell out the expected effectiveness of the measures relative to significance levels.

Conformance to Outline

Water Quality

Affected Environment

- Section IV does not follow outline (does not describe by region). However most of the info is there.

Environmental Consequences

- Section 5 does not follow outline
- Required Section 5.3 tables not included, or not in the required format.

REVIEW COMMENTS
CALFED BAY-DELTA PROGRAM PEIS TECHNICAL REPORTS
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AFFECTED ENVIRONMENT

No.	Page/Para	Comment
1	General	Document contains extensive detail on regulatory history and controls. Too much detail for PEIS. Extensive editing suggestions have been made to reduce the size of the document. However, most of the information presented in the report is valuable, so if there is not size concern for the document, it would stand as a useful reference to back up the PEIS/EIR.
1a	Introduction	Recommend that the statement describing the scope of the report be reduced from "resources associated with water quality in the Calfed geographic focus" to "surface water quality". The report should not address recreation or other water-related resources. The analysis should simply focus on surface water quality. Standards designed to protect beneficial uses of surface water can be used as significance criteria without requiring that the analyst understand the origin of the standards, thus keeping the focus on the characteristics of the water and not the water user.
2	General	Loading table should be completed for inclusion in PEIS.
3	General	Effects of parameters of concern should be included in WQ Section of PEIS.
4	General	Suggest inserting a statement to effect that - Affected Environment Section is not divided into 5 geographic regions to avoid repetition of description of environment because parameters of concern occur across several or all regions.
5	General	The concept of "loadings" should be explained/defined in simple language early in the document. The term may be unfamiliar to the general public (p1-17 and previous).
5a	Section 1.1	Contains information that should be presented in Chapter 4.0, or that may be presented in other technical reports. Follow the report outline and place setting information in the setting section. Overlap with other reports (e.g., flow data) is okay, since flows are a factor in water quality. Check for consistency in figures cited.
5b	Section 1.2	The discussion of the Calfed Program is not appropriate in the affected environment report. However, stakeholder concerns should be described to the extent that they exist independently of Calfed.
5c	Section 1.3	Discussion of beneficial uses should be incorporated, if possible, into Section 4.2 (Regulatory Context) or Section 4.3 (Other Information).
6	2-1, Sources of Info	Sources of Information. This section is suitable for inclusion in technical appendix, not main body of PEIS, where a summary table would provide sufficient detail.
7	3-3	List all 303(d) water bodies by region in a table.
8	3-7, Table 3-1	Distinguish between numerical standards or criteria, objectives, and suggested values. Table should be presented in technical appendices with abbreviated versions for each region in body of text (without extensive endnotes).
9	3-21	Subsection describing "Parameters of Concern" in Section 3.2

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		Historical Perspective and Section 3.3 Current Resource Conditions (p 3-61) should be combined and summarized to include source of contaminant, consequence of presence of elevated concentrations, number of monitoring stations, frequency of monitoring, recorded range of concentration, average concentration.
10	3-22, Table 3-2	Include in technical appendix.
11	3-28, Table 3-3	Include in technical appendix.
12	3-29	Text is discontinuous.
13	3-39	<p>Estimated loadings for parameters of concern: This series of graphs and tables should be incorporated into PEIS with the following enhancements:</p> <p>A. Consistent style, format, size required for plots. Table design could be improved and made consistent with PEIS styles.</p> <p>B. Written (brief) description for each, discussing availability of data, reliability of data, basic statistics (max loadings, minimum loadings, range)</p> <p>C. Footnotes suggest the data compilation is incomplete and will not be completed. "Further literature review required" - Literature reviews should be completed to present more complete data sets or at least a range of estimated loads from the listed sources.</p> <p>D. Table 3.12 Selenium Table 2 - delete (too detailed)</p> <p>E. "Source does not contribute significant load" should be differentiated from "Data available...calculations required" and "Further Lit. Review..." on the plots. It is important to distinguish between no effect and no data.</p>
14	3-52, Section 3.3.3	This section can be deleted from Affected Environment Section of PEIS.
15	3-61	See comment on p 3-21. A summary table of pollutant concentration ranges by region should be constructed. Figures 3.1 through 3.11 should not be included in PEIS.
16	3-82, Tables 3-17 to 3-19	Relate to study regions or do not include in PEIS.
17	3-83: Section 3.3.2 Impaired Water Bodies	<p>A. Change sense of working from "that may impair environmental beneficial uses" to "listed by the EPA as impaired".</p> <p>B. The 3 tables (plus a brief discussion of data) in Appendix A. Include in technical appendix of PEIS. Appendices B & C. Exclude from PEIS appendices. Appendix D should be included in PEIS under Environmental Setting/Affected Environment.</p>

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ENVIRONMENTAL IMPACTS/ CONSEQUENCES

No.	Page/Para	Comment
1	General	Report not complete - see note to reviewers - page 0.
2	General	Summary of impacts for each region to be extracted from Section 2.0 Summary.
3	General	The number of alternatives combined with the number of water quality parameters of concern make the task of reducing the discussion of water quality impacts to ~50 pages, without sacrificing pertinent detail, very difficult.
4	General	For this review, it is assumed that all Programmatic Actions for each Region are described in detail elsewhere in the PEIS and are not described in the Water Quality Section.
5	General	A summary of WQ Impacts suitable for the Executive Summary of the PEIS should be created from editing of Section 2 Summary of this document.
6	General	Story recommendation: Both WQ reports be reformed in the PEIS and Made available to interested public. Instead of creating a Technical Appendix of data/section extracted from the WQ reports.
7	General	<p>WQ Impacts discussion/descriptions are, by their character, repetitious for each alternative and each region. To decrease the number of words/pages in the WQ Impacts section either</p> <p>--a key table/section could be prepared (or referenced if already existing in another section of the PEIS) in which all possible impacts are fully described once and are associated with a key phrase. The reader would be directed to this table/section for a detailed description. Each alternative could then be discussed with reference to the table/section, avoiding repeating description of the same impacts for each alternative action.</p> <p>--or describe the potential impact fully one time and refer the reader to that description in subsequent sections (e.g., "Short-term and long-term impacts from this action will be similar to [or the same as] those impacts described in Action 6 for the San Joaquin Valley Region").</p> <p>This referencing earlier descriptions occurred more frequently toward the end of the document, but could also be applied throughout the document.</p>
8	General	Descriptions of Common Programs appear more extensive than discussions on Alternatives. However, by reducing repetitious passages in Common Program Impacts, the apparent emphasis on Common Programs may be eliminated and the levels of detail made more equal.
8a	Section 2.0	The discussion of No Action Alternative (2.4) should precede discussion of common programs (2.2) and other alternatives (2.3). Discussion of significance criteria should be included also. Tables 2-2 and 2-3 should include column for No Action Alternative impacts. It is not clear what these tables portray. Both address the same region, constituents, and locations but the impacts differ. The text does not clarify this. The text should provide more discussion of the tables.
9	5-30	Significant Impacts/Mitigation Methods are omitted from this section (Delta Region Programmatic Action 8) forward.

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10	5-33	Incomplete - Determination of Significance.
11	5-34	Section 5.2 Water Quality Program - general comments: A. Some subsections are incomplete or not addressed, as per authors' note at beginning of document. B. Repetitious descriptions of potential impacts - impairs readability - see global comment #7. C. Geographic region names are not consistent (e.g., Sacramento River Valley Region versus Sacramento River Basin). D. Include a table, similar to TABLE 5-6, listing proposed actions for all regions, or a matrix of Regions and Actions showing which have significant water quality impacts.
12	5-35	Reference citations are incomplete starting this page.
13	5-36	For the PEIS, the tables summarizing pollutant loadings (TABLES 5-7 through 5-17) should be omitted or moved to a technical appendix.
14	5-44	Indirect Impacts, Mitigation Measures are not addressed.
15	5-51	Indirect Impacts, Mitigation Measures are not addressed, San Joaquin Basin Action 5 not addressed.
16	5-58	Sac-San Joaquin Delta Action 4, Action 5 are not addressed.
17	5-58	A. San Francisco Bay - The assumption of 5 - 20% reduction in pollutant mass emissions should be expanded and justified. The effectiveness of the entire action is based upon this premise. At a minimum, the range of probable emission reductions should be discussed. B. A reduction of 5% of total metal emissions could be considered significant - at 95% confidence level. C. Similar comment for reduction of projected pollutant emissions from 13% (no action) to 3% (with action) - an overall 10%, or 23% decrease in the rate of change is significant.
18	6-1	Impacts of Storage and Conveyance Facilities. Indirect Impacts and Mitigation Measures are not addressed for any alternatives in this section.
19	7-1	Environmental Impacts of Alternatives. A summary table listing all alternatives should be included or referenced if existing elsewhere in PEIS. It is not clear why Alternative 1B is not addressed. It is not clear which alternatives relate to impacts in which regions.
20	7-26 onwards	Mode prediction plots - historical data could be plotted showing std deviation or variance as well as mean values - adding a measure of variation to which the predicted values could be compared.